

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Willard B. Crawford

Debtor

Chapter 13

Bankruptcy No.23-12626-AMC

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTOR

AND NOW comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtor, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtor has failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtor to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

Debtor(s) has/have failed to file amended schedules as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

Schedules I and J indicate that the debtor(s) will not be able to make all payments under the Plan and to comply with the Plan, in violation of 11 U.S.C. Section 1325 (a)(6).

The Plan violates 11 U.S.C. Section 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7.

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

Debtor has failed to complete 341 meeting

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee